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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Washington Utilities and Transportation
Commission's Petition for Additional
Delegated Authority to Implement Number
Conservation Measures

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NSD File No. L-99-102

Received

FEB 22 2000

Common Carrier Bureau
Network Service Division
Office of the Chief

CC DOCKET: 96-98

**COMMENTS OF THE MAINE PUBLIC UTILITIES COMMISSION
IN SUPPORT OF THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION'S PETITION FOR ADDITIONAL DELAGATED
AUTHORITY TO IMPLEMENT NUMBER CONSERVATION MEASURES**

The Maine Public Utilities Commission (MPUC) respectfully requests that the Common Carrier Bureau (CCB) grant the Petition of the Washington Utilities and Transportation Commission (WUTC) for Additional Delegated Authority to Implement Number Conservation Measures (Petition). The MPUC urges the CCB to act on the Petition as soon as possible so that the WUTC may take immediate steps to alleviate the current numbering crisis in Washington. As the FCC itself has already admitted in its Notice of Proposed Rulemaking (NPRM),¹ states need additional delegated authority on numbering issues to ensure that consumers are not burdened with unnecessary costs and inconvenience, as well as to ensure that the NANP does not prematurely exhaust.

I. Delegation of Authority Similar To The Delegations to California, New York, Florida, Massachusetts, Maine, Wisconsin, Connecticut, Ohio, New Hampshire, and Texas Will Not Negatively Impact the Development of National Numbering Rules

Granting the WUTC's Petition will not negatively impact the Federal Communications Commission's (FCC) consideration and development of national

¹ Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 99-122 (June 2, 1999).

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numbering rules nor will it result in a patchwork of state measures. The FCC's orders granting authority to Maine, Massachusetts, California, New York, Florida, Wisconsin, Connecticut, Ohio, New Hampshire, and Texas to begin thousand block pooling and implement other number conservation measures have struck the proper balance between allowing states with urgent needs to move forward and ensuring some level of uniformity among the states. The MPUC urges the CCB to delegate similar authority to Washington.

Staff from the WUTC have been participating in state numbering coordination efforts since June 1999, including weekly state conference calls relating to the coordination required by the FCC's orders granting delegated authority to other states. Thus, the WUTC is fully aware of the many issues that are arising as those states move forward with their new authority and with any consensus already reached among those states.

II. The Authority Requested by the WUTC Petition Is Similar to Authority Already Granted To Other States

The specific authority requested by Washington is similar to that already granted to the MPUC and other states. The MPUC has already submitted numerous comments on such measures in other dockets² and incorporates them herein by reference. The MPUC urges the CCB to grant the Petition in full.

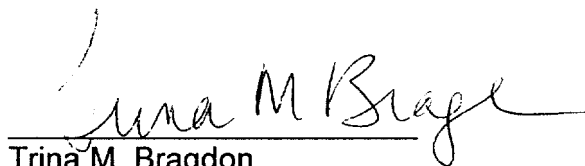
² See Comments In Support of the Petition of the California Public Utilities Commission and the People of the State of California For a Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures, DA 99-108, NSD File No. L-99-928 (July 15, 1999), Comments in Support of the Florida Public Service Commission's Petition for Expedited Decision For Grant of Authority To Implement Number Conservation Measures, DA 99-725, NSD File No. L-99-23 (April 2, 1999), Comment in Support of the Massachusetts Department of Telecommunications

III. Conclusion

As clearly delineated in the WUTC's Petition, current conditions require immediate action in order to protect consumers in Washington from the unnecessary expense and confusion associated with new area codes as well as to ensure that sufficient numbering resources are available to all carriers. Accordingly, the MPUC respectfully requests that the CCB grant the Petition of the Washington Utilities and Transportation Commission.

Respectfully submitted,

MAINE PUBLIC UTILITIES COMMISSION

A handwritten signature in cursive script, reading "Trina M Bragdon", written over a horizontal line.

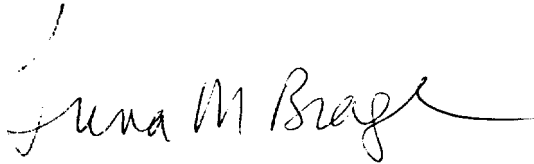
Trina M. Bragdon
Staff Attorney

Dated: February 4, 2000

and Energy's Request for Additional Authority to Implement Various Area Code Conservation Methods in the 508, 617, 781, and 978 Area Codes, DA 99-461 (April 2, 1999), Comments in Support of the New York State Department of Public Service Petition For Additional Delegated Authority To Implement Number Conservation Measures, DA 99-462 (April 2, 1999), Petition of the Public Utility Commission of Texas for Expedited Decision for Delegation of Authority to Implement Number Conservation Measures, NSD File No. L-99-55 (August 27, 1999), Connecticut Department of Public Utility Control's (CDPUC) Petition for Delegation of Additional Authority, NSD File No. L-99-62 (August 27, 1999).

CERTIFICATE OF SERVICE

I, Trina M. Bragdon, certify that a copy of the Comments of the Maine Public Utilities Commission in Support of the Petition of the Washington Utilities and Transportation Commission for Additional Delegated Authority to Implement Number Conservation Measures was served today, *via* U.S. mail, on the persons listed on the attached service list.

A handwritten signature in cursive script, reading "Trina M Bragdon", written over a horizontal line.

Trina M. Bragdon

Dated: February 4, 2000

SERVICE LIST

Rebecca Beaton
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